

February 27, 2014

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: Connect America Fund, WC Docket No.10-90

Dear Commissioners:

Nunn Communications, LLC hereby submits for your consideration an Expression of Interest in participating in the Next-Generation Network Experiments in Rural America described in WC Docket No. 10-90 Order document released on January 31, 2014.

Nunn Communications, LLC proposes to construct fiber-to-the-home facilities to homes in an unserved area of Weld County, Colorado, and to connect these homes to existing Gigabit Passive Optical Network equipment, voice switching equipment and data switching equipment and through this equipment to existing upstream networks.

Nunn Communications, LLC is a non-regulated telecommunications provider, and is a wholly owned subsidiary of Nunn Telephone Company. Nunn Telephone Company is an incumbent Local Exchange Provider. Nunn Communications is located at 285 Logan Street, PO Box 249, Nunn Colorado 80648, telephone (970) 897-2200.

The proposed service area is a subset of Census Tract ID 8123002501, in Weld County Colorado.

State	County	County Name	Tract ID	Eligible High Cost Locations	Extremely High Cost Locations	Annual Support
co	8123	Weld	8123002501	3	3	0

All of the homes to be connected with this project are currently in the CenturyLink Ault-Pierce Exchange boundary.

Nunn Communications proposes offering voice and internet service via Fiber-to-the-Home technologies. Homes and business in the proposed service area would be connected to the existing central office switching and network access facilities located in Nunn, Colorado. Any video services would be delivered as broadband enabled "over the top" offerings.

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Proposed service offerings include:

Voice

Basic local exchange service (Plain Old Telephone Service)
Access to Expanded Local Calling Area
Access to Emergency Services (E911)
Long Distance Services
Operator services
Information Services ("411")
Voice Mail Services

Unlimited Local (voice) Service plans begin at just under \$21/month. A voice services bundle will be offered at approximately \$50/month

Internet Tiers: (Up/Down)

768K/4M 1M/6M 3M/15M 25M/50M

Internet service at 1M/6M will be offered at \$60/month

No governmental participation is anticipated for this project, other than routine utility permitting

This project will require the construction of 23 miles of buried fiber optic cable, plus drops. Based on recent experience with this type of construction (2012-2013), the cost of this construction is estimated at \$20,000 per mile, for a total of \$460,000. The project will reach 26 unserved or underserved subscribers. This proposal would require one-time funding. A high-level estimate of the amount of funding requested is \$600,000.

The work can be completed within 12 months of approval of the funding.

Details of the proposed project are attached to this letter for additional information and clarification. If you have questions, or if you would like additional information, please call me at (970) 897-2200.

Respectfully submitted,

Gregory Grablander General Manager

Nunn Telephone Company

Attachment

Nunn Communications Expression of Interest Submitted to the Federal Communications Commission

The nature of the submitting entity or entities (e.g., incumbent LEC, municipality, utility, cable operator, wireless provider).

Nunn Communications is a non-regulated telecommunications provider, and is a wholly owned subsidiary of Nunn Telephone Company. Nunn Telephone Company is an incumbent Local Exchange Provider. Nunn Communications is located at 285 Logan Street, PO Box 249, Nunn Colorado 80648, telephone (970) 897-2200.

Identification of the proposed service area for the experiment, including census block number, with any relevant information regarding the number of locations that could be served, including schools, libraries, and other anchor institutions

The proposed service area is a subset of Census Tract ID 8123002501, in Weld County Colorado. This Census tract is identified by the FCC as having only three eligible locations and zero annual support, as shown in the table below.

State	County	County Name	Tract ID	Eligible High Cost Locations	Extremely High Cost Locations	Annual Support
со	8123	Weld	8123002501	3	3	0

This census tract is very large, covering 2,470 square miles, extending roughly 70 miles east-to-west and 50 miles north-to-south (not rectangular – see Figure 1). This area is very sparsely populated, with an average of 1.96 persons per square mile. There are a handful of very small towns in this census block (each with a population of less than 200 – see Figure 2). A large percentage of this census block is unpopulated land owned by the Federal Government and managed by the US Forest Service as the Pawnee National Grassland.

Three existing wireline companies provide telephone service to this area: Nunn Telephone Company, Wiggins Telephone Association and CenturyLink. (See Figure 3)

The FCC's list of "Eligible Locations" suggests that there are three eligible locations within Census Tract 25.01. After reviewing the FCC's CAF Phase II – CAM v4.0 Illustrative Map, Nunn Communications has identified only two occupied homes in the areas identified as "areas served by price cap carrier" and "not served by a competitor". One of these is located in the far northwest corner of the Census Tract. Nunn Telephone Company constructed fiber to the property line for this home during 2013. The owner has refused service, but can receive fiber based broadband service within 30 days of making a request. The other home appears to be unserved. (See Figure 4)

It is Nunn Communications' belief that the majority of the areas shown on the "Illustrative Map" as "served by a competitor" are not, in fact, served with broadband at speeds of 4M down/1M up. This belief is based on local knowledge of the area, including areas covered by nearby wireless providers. [There are no wireline competitors]. Nunn Communications believes that the wireless coverage areas are overstated. As this Rural Experiment program advances, Nunn Communications is prepared to defend this assertion.

Nunn has identified 23 subscribers in this Census Tract that are likely to be completely unserved, and which Nunn Communications proposes to serve. It is possible that less than 3 of these have access to one wireless service at the FCC's minimum broadband levels of 1.0/4.0 MB. (See Figure 5)

There are no schools, libraries or other anchor institutions in the proposed project area.

Contemplated service offerings (e.g., description of voice service, broadband speed tiers, nature of video service, if any) and pricing of such offerings

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Voice

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Unlimited Local (voice) Service plans begin at just under \$21/month. A voice services bundle will be offered at approximately \$50/month

Internet Tiers: (Up/Down)

768K/4M 1M/6M 3M/15M 25M/50M

Internet service at 1M/6M will be offered at \$60/month

If known, expected State and/or local or Tribal governmental participation in and/or support for the project (e.g., expedited permitting, access to rights of way, matching funds, etc.)

No governmental participation is anticipated for this project, other than routine utility permitting

Whether the proposal is expected to require one-time or continuing funding and a high-level estimate of the amount of funding requested

This project will require the construction of 23 miles of buried fiber optic cable, plus drops. Based on recent experience with this type of construction (2012-2013), the cost of this construction is estimated at \$20,000 per mile, for a total of \$460,000. The project will reach 23 unserved or underserved subscribers.

This proposal would require one-time funding. A high-level estimate of the amount of funding requested is \$ 600,000.

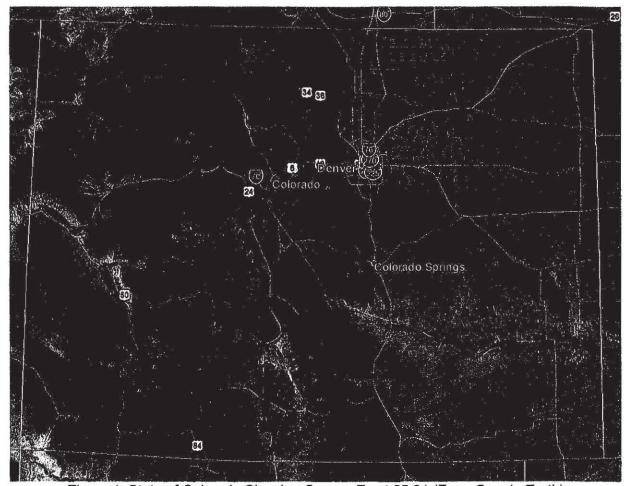


Figure 1: State of Colorado Showing Census Tract 25.01 (From Google Earth)

Figure 1 illustrates the size of Census Tract 25.01. This tract is 70 miles wide (east-to-west) at it's largest point, and a maximum of 40 miles wide (north-south).

The area is very thinly populated, and includes a large portion of the unpopulated Pawnee National Grasslands. Private lands are predominately used for grazing.

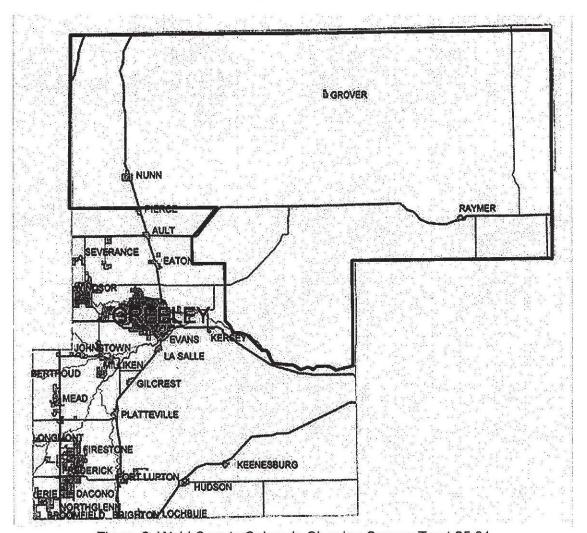
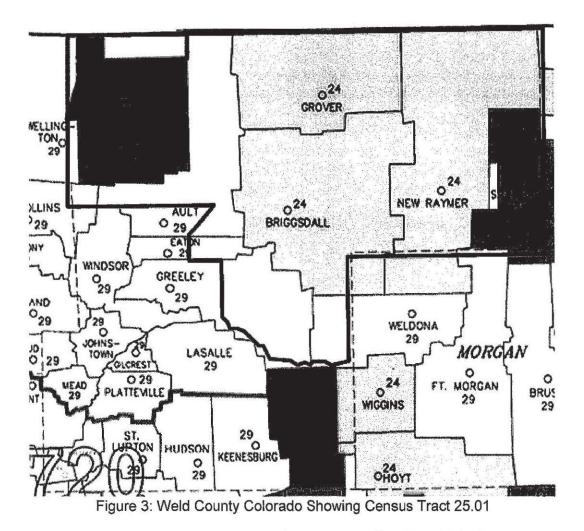


Figure 2: Weld County Colorado Showing Census Tract 25.01

Census Tract 25.01 encompasses the north ½ of Weld County, Colorado. The southern boundary is defined by the South Platte River, which runs through the more densely populated southern part of the county and through the city of Greeley. Census Tract 25.01 includes several small towns, including Nunn, Grover and Raymer. Other communities include Carr, Briggsdale and Stoneham, Colorado.



Census Tract 25.01 is served by four local exchange companies: Nunn Telephone Company (brown shading, northwest corner), Wiggins Telephone Association (light green shading, center & east), Stoneham Cooperative Telephone Corporation (purple shading, east side), and CenturyLink (white areas). CenturyLink is the only Price Cap LEC in this Census Tract.

Nunn Communications proposes to serve the "white space" between the LEC exchanges of Nunn Telephone Company and Wiggins Telephone Company.

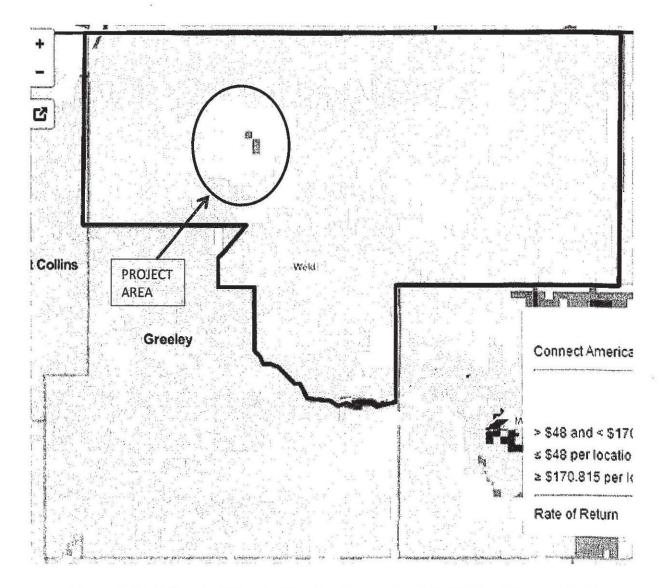


Figure 4: Weld County Colorado Showing Census Tract 25.01 (From Google Earth)
[Background Graphic from FCC's CAF Phase II —
CAM v4.0 Illustrative Map with Funding Threshold of \$48]

This map shows the locations of unserved areas in Census Tract 25.01. During 2013, Nunn Telephone Company constructed fiber optic cable in the small area in the extreme northwest corner of this tract, and that area is now 100% served. One homeowner refused service, but can be connected at anytime service is desired.

Nunn Communication's proposal is to provide service in the area shaded in light brown just to the left of center on this map. Nunn Communications asserts that none of this area is served with adequate broadband by a competitor, and proposes to provide service to all homes in the very high cost areas.

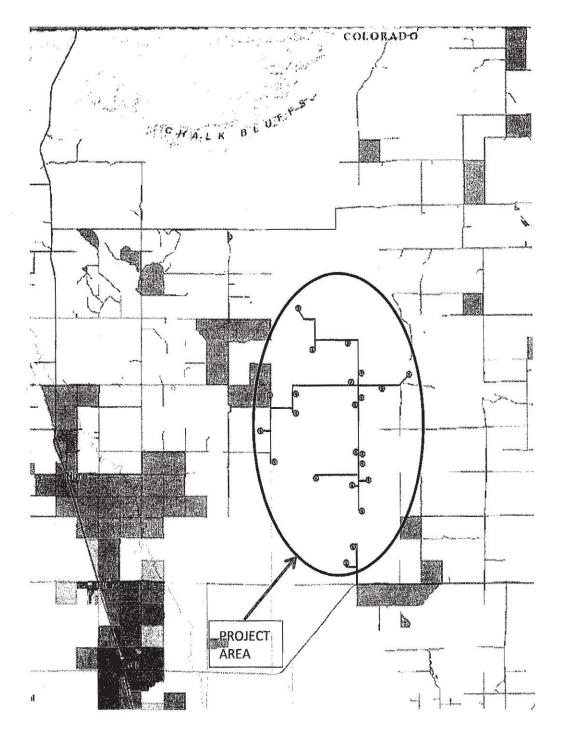


Figure 5: State of Colorado Broadband Map Showing Proposed Construction (Black lines indicate new fiber; circles represent locations to be served) (Brown lines & areas indicates existing Nunn Telephone Company facilities) (Green lines indicate existing Wiggins Telephone Association or CenturyLink facilities)